

## **APPENDIX A**

### **DEFENDANTS' FINANCIAL INFORMATION**

At the request of the United States, Defendants provided the following information regarding their ability to pay a civil penalty in this matter:

1. Consolidated financial reports for Fiscal Years (“FY”) 2014, FY 2014–15, FY 2015–16, FY 2016–17 (preliminary draft) prepared by independent auditors;
2. Tax information for Defendants for FY 2013, FY 2014, FY 2015, FY 2016;
3. Responses to requests by the United States under Section 208 of the CAA, 42 U.S.C. § 7542; and
4. Responses to questions posed by the United States, including information related to:
  - a. Defendants’ financial projections;
  - b. Cash flow;
  - c. Sales volume and pricing information;
  - d. Corporate structure and history;
  - e. Cost estimates of compliance measures required by this Decree;
  - f. Defendants financial obligations as of July 2018; and
  - g. Other miscellaneous questions.

Defendants submitted the above information under claim of Confidential Business Information.